

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- v. -

KEITH RANIERE,

Defendant.

No. 18-cr-204 (NGG) (S-2)

**Date of service: October 19, 2020**

**NOTICE OF MOTION**

**ORAL ARGUMENT REQUESTED**

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law, dated October 19, 2020, the Affidavit of Michele Hatchette, dated October 14, 2020, and the exhibits appended to the Affidavit, the Affidavit of Nicole Clyne, dated October 19, 2020, Defendant Keith Raniere through the undersigned attorney, Marc A. Agnifilo, will move the Honorable Nicholas G. Garaufis, United States District Judge for the Eastern District of New York, for (i) a new trial pursuant to Federal Rule of Criminal Procedure 33 and for such further relief as the Court may deem proper.

Dated:           October 19, 2020  
                  New York, NY

Respectfully submitted,

/s/  
Marc A. Agnifilo, Esq., *Of Counsel*  
**BRAFMAN & ASSOCIATES, P.C.**  
767 Third Avenue, 26th Floor  
New York, NY 10017  
(212) 750 – 7800

**DEROHANNESIAN &**  
**DEROHANNESIAN**  
677 Broadway – Ste. 707  
Albany, NY 12207  
Tel: (518) 465-6420  
Fax: (518) 427-0614